

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ANDREW PERRONG and STEWART  
ABRAMSON, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

CHARLES BARATTA LLC, a New York  
limited liability company, ARKADY  
FREKHTMAN ATTORNEY AT LAW, P.C.  
d/b/a FREKHTMAN & ASSOCIATES, a  
New York professional corporation,  
FLEMING NOLEN & JEZ LLP, a Texas  
limited liability partnership, RELIABLE  
LEGAL MARKETING CONSULTING,  
LLC, a Florida limited liability company,  
KRAUSE AND KINSMAN LAW, LLC, a  
Missouri limited liability company, LERNER  
& ROWE, PC, an Arizona Professional  
Corporation, and GACOVINO, LAKE &  
ASSOCIATES, P.C., a New York  
Professional Corporation.

Defendants.

Civil Action No. 2:21-cv-00996-JS-AYS

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, based on the accompanying Memorandum of Law, Defendants Krause and Kinsman Law LLC, Lerner & Rowe, PC, Arkady Frekhtman Attorney at Law, PC, Reliable Legal Marketing Consulting LLC, Gacovino, and Lake & Associates, P.C., by and through undersigned counsel, move this Court to dismiss Plaintiffs' Third Amended Complaint under Fed. R. Civ. P. 12(b)(2) and Fed. R. Civ. P. 12(b)(6).

In accordance with the briefing schedule set forth in the January 20, 2022, Minutes Entry, Doc. 79, any answering memorandum and opposing affidavits shall be served on or before March 14, 2022, and any reply papers shall be served on or before March 24, 2022.

Respectfully submitted,

Dated: February 22, 2022

/s/ Laura E. Kogan

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Laura E. Kogan (0087453) (*pro hac vice*)  
David M. Krueger (0085072) (*pro hac vice*)  
John N. Dagon (0098128) (*pro hac vice*)  
Jaquan Williams (0100189) (*pro hac vice*)  
BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP  
200 Public Square, Suite 2300  
Cleveland, Ohio 44114-2378  
Telephone: 216.363.4500  
Facsimile: 216.363.4588  
Email: lkogan@beneschlaw.com  
dkrueger@beneschlaw.com  
jdagon@beneschlaw.com  
jawilliams@beneschlaw.com

Edward C. Wipper  
BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP  
17 State Street, Suite 4000  
New York, New York 10004  
Telephone: (646) 593-7051  
Facsimile: (646) 798-8902  
Email: ewipper@beneschlaw.com

*Attorneys for Defendants Charles Baratta LLC,  
Krause and Kinsman Law, LLC, Lerner & Rowe,  
PC, Arkady Frekhtman Attorney at Law PC, Reliable  
Legal Marketing Consulting, LLC, and Gacovino,  
Lake & Associates, P.C.*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Laura E. Kogan

Laura E. Kogan